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June 9, 2022

Via ECF and Email

The Honorable John P. Cronan
U.S. District Judge
Southern District of New York

Re: United States v. Alexandre, No. 22 Cr. 326 (JPC)

Dear Judge Cronan:

Defendant Eddy Alexandre respectfully requests, with the government's consent, that the Court modify the conditions of his release to (1) strike the condition requiring that he post a BMW as additional security on the existing \$3 million personal recognizance bond; and (2) authorize Mr. Alexandre to attend religious services between 9:30 a.m. and 1:30 p.m. each Saturday at 173-04 Linden Blvd., St. Albans, New York 11412, and to travel to and from that location for that purpose. The Pretrial Services Office in the Eastern District of New York, where Mr. Alexandre is supervised, does not object to the requested modifications.

Mr. Alexandre is charged with wire fraud and violating the Commodity Exchange Act in an Indictment returned today. Dkt. 15. He was arrested on May 12, 2022, based on similar charges in a criminal complaint, and is currently subject to home incarceration with location monitoring at his home in Long Island pursuant to a set of modified conditions set by Judge Lehrburger on May 26, 2022. Dkts. 1, 12. Those conditions include the above-referenced \$3 million bond, co-signed by five financially responsible persons and secured by three pieces of property other than the BMW. The parties are requesting that the condition requiring further security in the form of the BMW be stricken because the government contends that proceeds of the alleged crimes were used to obtain the vehicle. *See* Dkt. 1 ¶ 19(g)(i); Dkt. 15 ¶ 3(a). A court-appointed temporary receiver in *CFTC v. Alexandre, et ano.*, No. 22 Civ. 3822 (VEC) is seeking to maintain the BMW as an asset pending further litigation. Mr. Alexandre is also requesting permission to attend religious services, on consent,

June 9, 2022
Page 2

because that weekly event has been and will continue to be an important part of the connections to his family and community that mitigate any flight-risk concerns in this case.

Respectfully submitted,

/s/ Emil Bove

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Attorneys for Eddy Alexandre

Cc: Counsel of Record
(Via ECF)

EDNY Pretrial Services
(Via Email)

Defendant's application is granted. Defendant's conditions of release are modified to (1) remove the requirement that he post a BMW as security on the \$3 million personal recognizance bond and (2) authorize his attendance at religious services between 9:30 a.m. and 1:30 p.m. each Saturday at 173-04 Linden Blvd., St. Albans, New York 11412, including travel to and from that location for purposes of attending religious services.

SO ORDERED.
Date: June 9, 2022
New York, New York


JOHN P. CRONAN
United States District Judge